

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re: KENT LINDUFF

Case No. 19-20025

§
§
§
§
§

MOTION TO COVERT TO CHAPTER 13

COMES NOW, Kent Linduff, Debtor in the above captioned chapter 7 case, and requests that this court convert this case to a case under chapter 13 and would show this court as follows:

1. The Debtor filed this case on January 28, 2019.
2. The Debtor desires to convert to a chapter 13 case.
3. The Debtor is eligible for relief under chapter 13.
4. This case has not been previously converted from a chapter 13 case.
5. Section 706 allows the Debtor to convert to a chapter 13.

6. This conversion is requested in good faith. An adversary proceeding has been filed by the chapter 7 trustee at Docket No. 31. The Debtor anticipates additional litigation brought by a creditor. The Debtor cannot afford to retain counsel for representation in litigation. The Debtor has exhausted his funds retaining counsel for state court litigation. The Debtor receives monthly social security payments and can fund his chapter 13 plan with social security payments. The Debtor has not attempted to harass, delay or mislead this court, the chapter 7 trustee, or any creditors.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this court enter an order converting this case to a case under chapter 13 and for such other and further relief as to which the Debtor is entitled.

Dated: April 23, 2019

Respectfully submitted,

/s/ Ryan Lott

Ryan Lott
TX Bar No. 24099886
Chern Law, LLC
3422 Rosefinch Trail
Austin, TX 78746
Phone: 512-809-6951
Fax: 512-717-6350
Email: thelottfirm@gmail.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

**In re:
KENT LINDUFF
Debtor**

§
§
§
§
§

**Case No. 19-20025
Chapter 7**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the *Motion to Convert to Chapter 13* was served on all parties receiving notice by operation of the Court's CM/ECF system, on the trustee and the U.S. trustee, as well as the parties listed on the attached service list via first class mail on or about April 24, 2019.

Respectfully submitted,

/s/ Ryan Lott

Ryan Lott
TX Bar No. 24099886
Chern Law, LLC
3422 Rosefinch Trail
Austin, TX 78746
Phone: 512-809-6951
Fax: 512-717-6350

Email: thelottfirm@gmail.com